

PIP REPORT

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Position paper on the potential impact of proposed changes to EU pesticide regulations on ACP countries



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Executive summary

In July 2006, the European Commission issued a proposal to replace Directive 91/414/EEC, the current EU legislation under which pesticides are approved for use. A series of amendments were adopted by the Parliament in January 2009, and the new regulation will probably come into force in late 2010 or early 2011. It introduces a major change: pesticide approvals will be based on “hazard-based cut-off criteria”, which take into account only the intrinsic chemical properties of a pesticide. This is in contrast to the current approvals process, which considers not only hazard (toxicity), but also risk (how a product is used, when, where, how frequently, etc.).

PIP has conducted an impact assessment to consider the potential implications of the new regulation on pesticides that are currently recommended and approved for use on horticultural export crops in ACP countries. The study takes into account the results of earlier studies by EU experts (FMFACCP, KEMI and PSD), which produced assessments of the likely pesticides that could be lost under the new regulation.

The PIP study concludes that though several pesticides currently used on export crops may be withdrawn in Europe, the new Regulation is not likely to have a major impact in ACP countries in the short-term. Substances will remain authorized until they come up for review when their Annex I listing expires, and even then the possibility of derogations should allow time to develop alternatives. Moreover, when a pesticide is withdrawn in Europe, continued use on ACP export crops will still be possible provided that the product is registered locally, and EU MRLs and Import Tolerances are complied with. Overall the impact is more likely to be felt over the longer-term, and particularly in the smallholder sector, due to the possible loss of some less expensive, broad spectrum pesticides and consequent increase in production costs.

Certain elements of the new regulation are still to be clarified. For example, the criteria for endocrine disruptors have not been finalised, giving rise to considerable uncertainty. It is also as yet unclear if Import Tolerances of substances that are withdrawn based on public health-related cut-off criteria will be set at the Limit of Quantification. PIP will closely follow the development and implementation of the new regulation, and will anticipate and take action as required.

The report notes that it is vital to begin developing alternative pest management strategies in order to limit the impact when substances are eventually lost. It also highlights the importance of working closely with manufacturers to encourage them to develop new products, and to introduce existing products into ACP countries. Based on the findings of this study, PIP will conduct more detailed evaluations on a crop-by-crop, pest-by-pest basis in order to identify potential problem areas in good time.

1. Background

In July 2006 the European Commission issued a proposal to replace Directive 91/414/EEC, the current EU legislation under which pesticides are approved for use. The new proposal is based on “hazard-based cut-off criteria” which take into account only the intrinsic chemical properties of a pesticide. Active ingredients with endocrine disruption, with certain carcinogenic, mutagenic or reprotoxic characteristics, for example, would be withdrawn. Some environmental characteristics would also be taken into account. The proposals differ markedly from the current approvals process, which takes into account not only hazard (toxicity), but also risk (how a product is used, when, where, how frequently, etc.).

The process of replacing the existing directive is complex as it has been subject to a co-decision procedure whereby the decision is shared between the Parliament and the Council. In October 2007 the Parliament introduced a series of amendments to the original proposal, and on 23 June 2008 the Council took its first position. In September 2008 a common position was adopted by the Council. Following continuing discussions between the EU Presidency, the Commission and Parliamentary rapporteurs, agreement was finally reached on a set of amendments to the Councils common position, and these were adopted by the Parliament in January 2009. They will be put to a meeting of the Agriculture Council for adoption by Member States in March/April 2009 and this is regarded as a formality. These will then be adopted by the Commission and published as a new Regulation.

Once the new Regulation is published, it will come into force 18 months later, probably towards the end of 2010 or early 2011.

At the present time, under the existing Directive 91/414, pesticides approved for use following the on-going review programme are listed in Annex 1 to the directive. When a pesticide is added to Annex 1, it is for a 10 year time period from the date of its inclusion in the Annex. When its time period under Annex 1 expires, each pesticide will be further reviewed before it is approved under the new Regulation.

Though the final amendments have now been adopted, discussions are still continuing regarding the actual implementation of the regulation, also on certain provisions for which additional legislation or further guidance is required. For example, the dates for dossier submissions in the case of substances with Annex 1 expiry dates within the first couple of years after the new Regulation comes into force have not been specified; submission for re-registration of these substances may well be delayed as a result.

Under the new Regulation, the situation regarding imported produce treated with substances that are withdrawn based on the cut-off criteria is also still somewhat unclear, although it is difficult to envisage a situation whereby separate provisions will apply. The inclusion of imported produce could, however, have implications under World Trade Organisation (WTO) arrangements, the provisions of which mean that imports can only be blocked if there is a demonstrable risk to health. This would mean looking not only at hazard but also risk – taking into account exposure data. Proving a health risk would be difficult given that under the current approvals process – which involves risk assessment – they are already approved.

In this review the aim was to consider the potential implications of the regulatory changes on pesticides that are currently recommended and approved for use on horticultural export crops in ACP countries. The impact assessment focuses on a selection of key crops.

In this assessment consideration is only given to the impact of changes under the regulations. Requirements imposed under private industry standards (which may be more stringent than the legal requirements) have not been included. Special attention is paid to the potential loss of import tolerances as a consequence of the cut-off criteria laid down in the new regulation, and to the timeframe in which this could happen (Annex I expiries and renewal timelines).

2. The Cut-Off Criteria

Under the criteria defined in the new Regulation substances will not be permitted for use (cut off) if they are classified as:

- Category 1 or 2 mutagens;
- Category 1 or 2 carcinogens or reproductive toxins unless exposure is “negligible”;
- Endocrine disruptors which may cause adverse effects unless exposure is “negligible”;
- Persistent Organic Polluters (PoPs);
- Persistent – Bio accumulative – Toxic (PBT);
- Very persistent – very Bio – accumulative (vPvB).

Derogation: The Council also added an important derogation (exception to the rule). This allows for the approval of active substances for a period of five years where it is deemed necessary to “control a serious danger to plant health which cannot be contained by other means” even if it does not satisfy the requirements on carcinogenic or reproductive toxicity category 2 or endocrine disruptors. This derogation authorization is renewable, although the Commission has indicated that they would only expect the derogation to be used under exceptional circumstances.

Pesticides not Approved for Use. As noted above, all pesticides will be reviewed against the criteria when they reach their Annex 1 expiry dates. Active substances that trigger the cut-off criteria will be banned once their initial 10 year Annex I inclusion comes to an end (although derogation could then apply).

Hazard Categories. Each reviewed pesticide will be classified into different categories depending on the hazard.

Substitution. Some substances may be approved, but classified as candidates for substitution. These are substances that may subsequently be eliminated when safer alternatives become available. Substances categorised as “for substitution” can be approved under the new Regulation for up to seven years, and this authorisation is renewable. Furthermore, if they are needed for resistance management, they may remain on the market even if there is an available alternative.

Problems of Definition. Several experts have attempted to conduct assessments of the likely impact that these changes will have on the availability of plant protection products. They have all commented on the difficulty experienced in defining the list of substances that will/could be banned under the new Regulation because some of the criteria are still to be finalised.

In particular, there is still no final and agreed definition of endocrine disruption. A scientific definition of endocrine disruption will be put into place within the next four years, but in the interim, the definition that will be used covers substances which are:

- Classified as C3 + R3: these shall be regarded as having endocrine disrupting properties;
- Classified as R3 and which have toxic effects on the endocrine organs – may be considered to have endocrine disrupting properties.

There is an urgent need to agree the definition of the final criteria in order to enable effective assessment to be made of all active substances.

3. EU Expert Assessments

In late 2008 (September – December), the German Federal Ministry on Food, Agriculture and Consumer Protection (FMFACCP), the Swedish Chemicals Agency (KEMI) and the UK Pesticides Safety Directorate (PSD) produced assessments of the likely substances that could be lost under the new Regulation. It should be noted that these assessments are speculative and provisional, based on review reports that may be incomplete. The German¹ and Swedish² bodies made a single assessment using their best judgement with the available guidance, while the UK conducted four assessments, which were published as Annexes 2A – 2C and Annex 3 of their assessment report³.

Annexes 2A – 2C of the PSD assessments are alternative possible scenarios based on the different potential definitions of endocrine disruptors. Annex 3 relates to additional substances that could be vulnerable to the EU Environment, Public health and Food Safety (ENVI) Committee amended criteria for developmental neurotoxicity. The PSD assessments were as follows:

PSD Annex 2A: Substances that may not be approved according to the Council common position (endocrine disruption definition based on the May 2008 UK assessment, and assuming “may cause an adverse effect” interpreted in a broad way).

PSD Annex 2B: Substances that may not be approved according to the Council common position assuming assessment using the ENVI Committee proposal to define potential endocrine disruptors as substances which are, for example, R3.

PSD Annex 2C: Substances that may not be approved according to the Council common position assuming assessment using the Swedish criteria (potential endocrine disruptors which are R2 or R3 and C3, or substances classified as R2 or R3 and which have toxic effects on endocrine organs).

PSD Annex 3: Additional substances that could be vulnerable to ENVI Committee amended criteria for developmental neurotoxicity; this Annex does not include other substances which may fail other ENVI Committee criteria (Annex 2B).

The Swedish assessment covered 271 substances and the UK assessment 278. Construction of the lists was slightly different in each case, but neither included substances on List 4 of the Annex 1 review programme (under the current Directive), nor new substances pending decision on Annex I inclusion. The list of substances reviewed under the assessments is given in Appendix I. The detailed results of their assessments are given in Appendix II.

Comparison between the different assessments in Appendix II, when based on the same criteria, shows relatively little difference between the three Government assessments.

1 Federal Ministry on Food, Agriculture and Consumer Protection, Germany. Summary of assessment of the new pesticide legislation.

2 Kemikalieninspektionen. (Swedish Chemicals Agency). Interpretation in Sweden of the impact of “cut-off criteria” adopted in the common position of the Council concerning the Regulation of placing plant protection products on the market.

3 Pesticide Safety Directorate, now CRD, Chemicals Regulation Directorate, UK. Revised assessment of the impact on crop protection in the UK of the “cut-off criteria” and substitution provisions in the proposed Regulation of the European Parliament and of the Council concerning the placing of plant protection products on the market.

4. PSD Findings

PSD conducted a second refined analysis using the interim criteria for endocrine disruptors and subsequently issued a revision of their conclusions, and these are considered to be the best available assessment at the present time of the impact of replacing Directive 91/414/EEC on EU pesticide registrations. They conclude that the full implications of the proposed changes are still unclear, but based on the interim criteria for endocrine disruptors, they developed an assessment of the substances most likely to be eliminated using the hazard criteria (Table 1). The revised impact is expected to lie broadly between those of the common position used in the Swedish assessment and those in Annexes "A and 2C of PSD's second assessment.

Tables 1 and 2 below indicate Annex I expiry dates for a range of pesticides, also whether the substance would be allowed the option of derogation (Yes/No). However, as noted previously, these lists are provisional; it will only be known if these substances do in fact trigger the cut-off criteria when they are submitted for full review.

Table 1: PSD list of substances most likely to be eliminated following the replacement of EU Directive 91/414 (using the interim criteria for endocrine disruptors ⁴

Substance	Hazard criteria under which failed	Expiry of Annex 1 approval	Derogation available y/n
Insecticides			
Bifenthrin	PBT/vPvB + Endocrine?	2018	N
Esfenvalerate	PBT	2011	N
Flufenoxuron	C2/PBT	2020	N
Lufenuron	PBT/vPvB	2018	N
Thiacloprid	Endocrine ?	2014	Y
Fungicides			
Bitertanol	R2 + Endocrine	2020	Y
Carbendazim	M2/R2 + Endocrine ?	2009	N
Cyprocinazole	Endocrine ?	2020	Y
Dinocap	R2	2009	Y
Epoxiconazole	Endocrine ?	2018	Y
Fenbuconazole	Endocrine ?	2020	Y
Flusilazole	R2 + Endocrine ?	N/A	Y
Iprodione	Endocrine ?	2013	Y
Mancozeb	Endocrine ?	2016	Y
Maneb	Endocrine ?	2016	Y
Metconazole	Endocrine ?	2017	Y
Quinoxifen		2014	N
Tebuconazole	Endocrine ?	2018	Y
Herbicides			
Amitrole	Endocrine ?	2011	Y

⁴ Pesticides Safety Directorate, UK. Proposal for a Regulation of the European Parliament and of the Council Concerning the Placing of Plant Protection Products on the Market. Summary Impact Assessment

Substance	Hazard criteria under which failed	Expiry of Annex 1 approval	Derogation available y/n
Flumioxazine	R2	2012	Y
Glufosinate	R2	2017	Y
loxynil	Endocrine ?	2015	Y
Linuron	R2 + Endocrine ?	2013	Y
Molinate	Endocrine ?	2014	Y
Pendimethalin	PBT	2013	N
Tralkoxydim	Endocrine ?	2019	Y

PSD also refined its list of substances that may be eliminated by hazard criteria depending upon the application of the provision for potential endocrine disruptors (including substances which are, or might be, classified as category 3 carcinogen and reproductive toxin, regardless of evidence of endocrine disruption). These substances are indicated in Table 2.

Table 2: PSD list of substances that may be eliminated with the application of potential endocrine disruptors (including substances which are, or might be, classified as category 3 carcinogen and reproductive toxin, regardless of evidence of endocrine disruption)⁵

Substance	Hazard criteria under which failed	Expiry of Annex 1 approval	Derogation available, Y/N
Insecticides			
Deltamethrin	Endocrine ?	2013	Y
Dimethoate	Endocrine ?	2016	Y
Fungicides			
Difenoconazole	Endocrine ?	2018	Y
Folpet	Endocrine ?	2017	Y
Fluquinconazole	Endocrine ?	2020	Y
Fuberidazole	Endocrine ?	2019	Y
Metiram	Endocrine ?	2015	Y
Myclobutanil	Endocrine ?	2020	Y
Penconazole	Endocrine ?	2019	Y
Prochloraz	Endocrine ?	2020	Y
Propiconazole	Endocrine ?	2013	Y
Prothioconazole	Endocrine ?	2018	Y
Tetraconazole	Endocrine ?	2019	Y
Thiram	Endocrine ?	2013	Y
Triadimenol	Endocrine ?	2018	Y
Triticonazole	Endocrine ?	2017	Y
Herbicides			
2,4-D	Endocrine ?	2011	Y
Carbetamide	Endocrine ?	2020	Y
Chlortoluron	Endocrine ?	2016	Y

⁵ Pesticides Safety Directorate, UK. Proposal for a Regulation of the European Parliament and of the Council Concerning the Placing of Plant Protection Products on the Market. Summary Impact Assessment

Substance	Hazard criteria under which failed	Expiry of Annex 1 approval	Derogation available, Y/N
Fluometron	Endocrine ?	2020	Y
Metribuzin	Endocrine ?	2017	Y
Picloram	Endocrine ?	2018	Y
Tepaloxymidim	Endocrine ?	2015	Y
Trisulfuron	Endocrine ?	2018	Y
Soil Sterilant			
Metam	Endocrine ?	2019	Y

The criteria finally agreed for identifying substances for substitution are very similar to those originally proposed by the Commission. PSD has produced a list of 65 of substances that are likely to be classified as “for substitution” (Table 3). However, this list is not exhaustive and some substances have not been assessed (e.g. substances still under review, list 4 substances and new substances).

TABLE 3: Provisional list from PSD of substances likely to be classified as “for substitution”

SUBSTANCE	REASON	SUBSTANCE	REASON
Insecticides		Fungicides	
Abamectin	ADI ≤ 0.001	Chloropicrin	ADI ≤ 0.001, ARfD ≤ 0.01
Acrinathrin	ADI ≤ 0.001, AOEL ≤ 0.001 ARfD ≤ 0.01	Chlorothalonil	2 PBT
Deltamethrin	ARfD ≤ 0.01	Cyproconazole	2 PBT
Dimethoate	ADI ≤ 0.001, ARfD ≤ 0.01	Cyprodinil	2 PBT
Ethoprophos	PBT ADI ≤ 0.001, AOEL ≤ 0.001, ARfD ≤ 0.01	Dimoxystrobin	ARfD ≤ 0.01
Etofenprox	2 PBT	Epoxiconazole	2 PBT
Etoxazole	2 PBT	Famoxadone	2 PBT
Fenamiphos	ADI ≤ 0.001, AOEL ≤ 0.001 ARfD ≤ 0.01	Fenbuconazole	2 PBT
Fenbutatin oxide	2 PBT	Fluquinconazole	ADI ≤ 0.001, AOEL ≤ 0.001
Fenpyrximate	ARfD ≤ 0.01	Metconazole	2 PBT ARfD ≤ 0.01
Fipronil	2 PBT ADI ≤ 0.001, AOEL ≤ 0.001 ARfD ≤ 0.01	Propiconazole	2 PBT
Formetanate	ARfD ≤ 0.01	Silthiofam	2 PBT
Fosthiazate	2 PBT ARfD ≤ 0.01	Tetraconazole	ARfD ≤ 0.01
Imidacloprid	2 PBT	Triazoxide	ADI ≤ 0.001,

SUBSTANCE	REASON	SUBSTANCE	REASON
Lambda cyhalothrin	2 PBT ARfD ≤ 0.01		
Oxamyl	ADI ≤ 0.001, AOEL ≤ 0.001 ARfD ≤ 0.01		
Pirimicarb	2 PBT		
Pirimiphos methyl	ADI below 0.01mg/kg		
Propargite	2 PBT		
Spinosad	2 PBT		
Taufluvinate	ARfD ≤ 0.01		
Tefluthrin	ARfD ≤ 0.01		

TABLE 3 (continued): Provisional list from PSD of substances likely to be classified as “for substitution”⁶

SUBSTANCE	REASON	SUBSTANCE	REASON
Herbicides		Herbicides	
Acetochlor	2 PBT	Mesosulfuron	2 PBT
Aclonifen	2 PBT	Metazachlor	2 PBT
Amidosulfuron	2 PBT	Metribuzin	2 PBT
Amitrole	2 PBT ADI ≤ 0.001, AOEL ≤ 0.001	Metsulfuron methyl	2 PBT
Chlorotoluron	2 PBT	Nicosulfuron	2 PBT
Chlorsulfuron	2 PBT	Oxadiazon	2 PBT
Diflufenican	2 PBT	Oxyfluorfen	2 PBT
Diquat	2 PBT AOEL ≤ 0.001	Paclobutrazol	2 PBT
Flufenacet	2 PBT	Propoxycarbazone	2 PBT
Fluometuron	2 PBT	Prosulfuron	2 PBT
Isoproturon	2 PBT	Tepraloxymid	2 PBT
Lenacil	2 PBT	Terbuthylazine	ARfD ≤ 0.01
Mecoprop	2 PBT	Tralkoxydim	2 PBT ARfD ≤ 0.01
Plant Growth Regulator			
1-methylcyclo-propene	ADI ≤ 0.001		
Soil Sterilant			
Metam	ADI ≤ 0.001		

⁶ Pesticides Safety Directorate, UK. Proposal for a Regulation of the European Parliament and of the Council Concerning the Placing of Plant Protection Products on the Market. Summary Impact Assessment

5. Summary of EU Expert Assessments

Table 4 summarises the conclusions of the three EU expert assessments concerning the number of pesticides that could potentially be lost when Directive 91/414 is replaced by the new Regulation.

Table 4: Suggested number of substances that could be lost according to the three EU expert assessments

	FMFACP	KEMI	PSD Annex 2A	PSD Ann. 2B	PSD Ann. 2C	PSD Ann. 3
Herbicides	7	8	9	7	6	7
Fungicides	8	11	24	13	12	3
Insecticides	3	3	6	5	4	23
Other	1	1	1	1	1	1
Total	19	23	40	26	23	34
% Of subst. assessed	?	8.5	14	9	8	12

In the PSD assessment, the 34 substances listed in Annex 3 were additional to those given in Annexes 2A – 2C, indicating a potential loss of between 57 and 74 substances. In contrast, the German and Swedish assessments indicated a potential loss of 19 and 23 substances respectively.

This helps to illustrate the uncertainty of current assessments, where the same guidance can be interpreted differently. The situation will not be clarified until the criteria for endocrine disruptors and, to a certain extent, criteria for PTBs and vPvB have been finalised, and ultimately, until the substances have been reviewed.

The refined PSD assessment, as detailed above in Section 4 above, shows the 26 substances **most likely** to be lost (8 herbicides, 13 fungicides, 5 insecticides) and a further 25 substances **that may** be lost (8 herbicides, 14 fungicides, 2 insecticides and one soil sterilant. Sixty four substances have also been identified as potential candidates for substitution (26 herbicides, 14 fungicides, 22 insecticides and 2 others).

The original PSD assessment largely included the same substances, but the refinement meant that many of the substances originally identified as candidates for withdrawal were moved instead to the “substitution list”.

6. COLEACP-PIP Impact Assessment

The EU expert assessments, notably the PSD studies, suggest that the replacement of Directive 91/414 with the new regulation could result in the withdrawal of many of the pesticides currently available for use in the EU. They predicted that as a result there could be major consequences for EU agriculture and food production. Potentially severe impacts were predicted in the horticultural sector in particular, owing to the likely reduced number (and spectrum) of fungicides remaining.

The significance for third countries exporting to Europe is as yet unclear. In October 2008 PIP-COLEACP prepared a position paper focusing on the potential repercussions of the proposed changes to the ACP horticultural export sector. Following acceptance of the final amendments in January 2009, this original review has been updated. The aim was to assess the pesticides that are likely to be lost from use on export crops destined for the European market. In particular, the study aimed to identify potential problem areas where the loss of registered pesticides could result in important crop protection problems.

As with the original review, the study focused on the potential impact of the regulatory changes on pesticides registered for use on a small selection of crops. Chosen for the exercise were French beans, peas (edible pod) and passion fruit under Kenyan registration data; and papaya and yams under Jamaican registration data. In addition, for yams, okra and pineapple (MD2 and Smooth Cayenne varieties), an assessment was made of the potential implications for the recommendations made in the PIP Technical Itineraries. These are crop protocols developed as guides for producers and exporters on responsible, effective crop production including recommended pesticides.

For the review, information was drawn from a number of sources including:

- PSD documentation and the PSD website,
- the Federal Ministry on Food, Agriculture and Consumer Protection, Germany (FMFACCP),
- the Swedish Chemicals Agency (KEMI),
- European Crop Protection Association,
- PIP databases,
- PIP Crop technical Itineraries,
- the Pest Control Products Board list of pesticides registered for use in Kenya,
- the Registration database of the Pesticides Control Authority of Jamaica.

For the purposes of this review, the findings and conclusions of the refined PSD assessment were used.

7. Potential Impact in ACP Countries: Findings and Conclusions

Appendices III – XI of this report provide tables summarising the pesticides currently registered for use on a selected number of crops and countries, and indicate which would likely be affected by the regulatory changes.

It is important to note that these listings are speculative. The identification of substances that could be affected is based on the currently available information – and therefore on data which is incomplete. Whether or not a substance will really be withdrawn based on the cut-off criteria will only become clear when their Annex 1 registration has expired and they are subject to review.

From the tables it can be seen that the new procedures are likely to result in the phasing out of some substances after their Annex I registration has expired. However, even if this happens, there is the possibility of a further five years extension subject to derogation. This will significantly help to reduce the short-term impact and will allow time for alternative substances to be introduced.

Concerning the future availability of alternative pesticides, one of the compounding factors facing ACP producers is the reluctance of some manufacturers to register new or alternative substances in these countries, either on the grounds of cost or because of national/regional marketing strategies. Manufacturers have to finance the development of the data package necessary for registration, as well as the registration itself, and for countries or crops where predicted sales are limited, it is simply not an attractive commercial proposition. As a result, when substances are withdrawn under the new Regulation, the choice of new or alternative products available may be particularly limited in some ACP countries. The role of national exporter associations, or task forces where these exist, in working with manufacturers will be critical to the broadening of substances available to producers.

Another potential problem for ACP countries concerns the future of import tolerances. Currently Regulation 396/2005 on the fixing of MRLs provides the possibility of obtaining import tolerances for substances that are not authorized in the EU if the reasons for this are not related to human health. This has up to now provided a very important route to allow for the use of some key pesticides on horticultural crops (many of them minor crops) in ACP countries. Since under the new Regulation substances may be excluded from registration based on public health related cut-off criteria, it is at present not clear how this provision will affect the use of import tolerances, and if this possibility will continue to exist.

The general practice is that where a substance is withdrawn from use, its MRLs are normally set at the limit of quantification (LoQ), effectively precluding its use. However, recently the MRLs of the substance fenarimol have been reviewed. Based on endocrine effects fenarimol had received only a limited Annex I inclusion which expired in 2008. It appears that the MRLs for this substance will not automatically be set at the LoQ but will continue to be set at higher limits as can be supported by toxicological and dietary risk assessment. A submission for import tolerances is currently with the European Food Standards Agency. If this practice is extended, or adopted within the new Regulation, then the situation with regard to the MRLs or import tolerances for withdrawn substances may also provide some relief to producers. This situation will need careful observation.

Irrespective of the final timescale for the withdrawal of some substances and the introduction of alternatives, the problem in ACP countries will be greatest at the smallholder level. Farmers with limited resources tend to use the less expensive pesticides or broad spectrum products that minimise the number of substances that they need to buy. In the event that these products are lost from use under the replacement of Directive 91/414, and if there is no possibility of obtaining import tolerances, some producers may simply find alternative products too expensive.

In the long-term, there may be a greater impact because of the loss of fungicides than insecticides, particularly for small-scale producers whose product choices are more limited by price. Substances such as mancozeb, maneb and carbendazim are extremely popular with smallholders as they have a broad spectrum of activity and are available at a reasonable price. Should these substances disappear there will be an impact on production cost as the alternatives are likely to be more expensive.

Conclusions

Though there is no doubt that some important pesticides will be lost, provisions under the new regulation will reduce the impact of the changes in the short-term. In the case of mancozeb, for example, it is likely that it will remain on the market until its Annex I registration expires in 2016. In the event that it triggers the human health cut-off criteria (carcinogenic or reproductive toxicity 2 or endocrine disruptors) when it is re-evaluated under the new Regulation, an additional five year extension may be allowed under the derogation procedure. This substance could therefore potentially be available for up to 12 years, allowing time for alternatives to be evaluated. The scenario could be similar for a number of the other substances also.

The biggest problem at the present time results not from the regulatory changes, but because many substances registered for use on a variety of crops in ACP countries are not on Annex I to Directive 91/414/EEC and, as a result, can only be used if residues in the harvested crop are below the MRL, which in many cases is set at the Limit of Determination.

In terms of the impact of regulatory changes on recommendations within the selected PIP technical itineraries included in the study, some potential problems were identified. For pineapple (MD2 and Smooth Cayenne), the insect control measures recommended in the technical itineraries under the current country registrations could become extremely limited. Though this is largely because of their non-inclusion in Annex I, the proposed changes do exacerbate the problem.

For the okra technical itinerary, recommendations concerning insecticides do not indicate major problems based on the available reviews. However, of the 11 recommended fungicides, 4 are likely to be withdrawn, 2 may be withdrawn and 1 is a candidate for substitution. Nevertheless the timescale for these actions does allow time for the introduction or evaluation of alternatives.

In conclusion, the new Regulation is not likely to have a major impact on export production in ACP countries in the short-term. Any potential impact will be longer-term and gradual, when substances are reviewed under the new Regulation. The timing of their review will depend on the expiry date of their Annex I listing and on the subsequent organisation of the workload by the Commission. Until then the substance will remain available. The possibility of derogations also allows time to develop alternatives.

The future possibility of using import tolerances is as yet unclear and could have important consequences. This aspect needs to be monitored and, if possible, influenced.

The impact of the new Regulation is more likely to be felt over the longer-term, and particularly in the smallholder sector due to the loss of some less expensive, broad spectrum pesticides and consequent increase in production costs. It is essential that effort is put to developing alternative pest management strategies in good time to limit the impact when substances are lost. It is important to work closely with manufacturers, to encourage them to develop new products, and to introduce existing products into ACP countries.

Based on the findings of this study (Appendices III – XI), PIP is conducting more detailed evaluations of the possible impact of the new regulation on a crop-by-crop, pest-by-pest basis. This will allow potential problem areas to be identified and addressed.

Appendix I Pesticides evaluated by PSD and KEMI

The following table lists the substances evaluated by KEMI and by PSD; the FMFACCP list was not available for reference. "X" denotes that a substance was assessed; note that not all substances were assessed by both countries.

SUBSTANCE	ACTION	PSD	KEMI
1- methylcyclopropene	Plant growth regulator	X	X
2,4-D	Herbicide	X	X
2,4-DB	Herbicide	X	X
Abamectin	Insecticide	X	X
Acetamiprid	Insecticide	X	X
Acetochlor	Herbicide	X	
Acibenzolar-s-methyl	?	X	X
Aclonifen	Herbicide	X	X
Acrinathrin	Insecticide	X	
Alpha cypermethrin	Insecticide	X	X
Aluminium phosphide	Insecticide	X	X
Amidosulfuron	Herbicide	X	X
Amitrole	Herbicide	X	X
Ampelomyces quisqualis	Fungicide	X	X
Asulam	Herbicide	X	
Azimsulfuron	Herbicide	X	X
Azoxystrobin	Fungicide	X	X
Bacillus subtilis	Fungicide	X	X
Bacillus thuringiensis subsp: Aizawai	Insecticide		X
Bacillus thuringiensis subsp: Israelensis	Insecticide		X
Bacillus thuringiensis subsp: Kurstaki	Insecticide		X
Bacillus thuringiensis subsp: Tenebrionis	Insecticide		X
Beauveria bassiana	Insecticide		X
Beflutamid	Herbicide	X	X
Benalaxyl	Fungicide	X	X
Benfluralin	Herbicide	X	X
Bensulfuron	Herbicide	X	X
Bentazone	Herbicide	X	X
Benthialivalicarb	Fungicide		X
Benzoic acid	Disinfectant	X	X
Beta-cyfluthrin	Insecticide	X	X

SUBSTANCE	ACTION	Commission criteria	Parliament criteria
Bifenazate	Insecticide	X	X
Bifenox	Herbicide	X	X
Bifenthrin	Insecticide	X	X
Bitertanol	Fungicide	X	
Boscalid	Fungicide		X
Bromoxynil	Herbicide	X	X
Bupirimate	Fungicide	X	
Burgundy mixture	Fungicide		X
Calcium Phosphide	Rodenticide	X	X
Captan	Fungicide	X	X
Carbendazim	Fungicide	X	X
Carbetamide	Herbicide	X	
Carboxin	Herbicide	X	
Carfentrazone ethyl	Herbicide	X	
Carvone			X
Chloridazon	Herbicide	X	X
Chlormequat	Plant growth regulator	X	X
Chloropicrin	Fungicide	X	
Chlorothalonil	Fungicide	X	X
Chlorotoluron	Herbicide	X	X
Chlorpropham	Plant growth regulator	X	X
Chlorpyrifos	Insecticide	X	X
Chlorpyrifos methyl	Insecticide	X	X
Chlorsulfuron	Herbicide	X	X
Chlorthal-dimethyl	Herbicide		X
Cinidon ethyl	Herbicide	X	X
Clethodim	Herbicide	X	X
Clodinafop	Herbicide	X	X
Clofentezine	Insecticide	X	X
Clomazone	Herbicide	X	X
Clopyralid	Herbicide	X	X
Clothianidin	Insecticide	X	X
Coniothyrium minitans	Fungicide	X	X
Copper compounds	Fungicide	X	X
Cubiet	Insecticide		X
Cyazofamid	Fungicide	X	X
Cyclanilide	Plant growth regulator	X	X
Cycloxydim	Herbicide	X	
Cydia pomonella granulosus	Insecticide		X
Cyfluthrin	Insecticide	X	X

SUBSTANCE	ACTION	Commission criteria	Parliament criteria
Cyhalofop butyl	Herbicide	X	X
Cymoxanil	Fungicide	X	X
Cypermethrin	Insecticide	X	X
Cyproconazole	Fungicide	X	

SUBSTANCE	ACTION	Commission criteria	Parliament criteria
Cyprodinil	Fungicide	X	X
Cyromazine	Insecticide	X	X
Daminozide	Plant growth regulator	X	X
Dazomet	Soil Sterilant	X	
Deltamethrin	Insecticide	X	X
Desmedipham	Herbicide	X	X
Dicamba	Herbicide	X	X
Dichlorobenzoic acid methyl ester	Plant growth regulator	X	X
Dichlorprop p	Herbicide	X	X
Diethfencarb	Fungicide	X	
Difenoconazole	Fungicide	X	X
Diflubenzuron	Insecticide	X	X
Diflufenican	Herbicide	X	X
Dimethachlor	Herbicide	X	X
Dimethanamid – p	Herbicide	X	X
Dimethoate	Insecticide	X	X
Dimethomorph	Fungicide	X	X
Dimoxystrobin	Fungicide	X	X
Dinocap	Fungicide	X	X
Diphenylamine	?	X	X
Diquat	Herbicide	X	X
Dithianon	Fungicide	X	
Diuron	Herbicide		X
Dodemorph	Fungicide	X	X
Dodine	Fungicide	X	
Epoxiconazole	Fungicide	X	X
Esfenvalerate	Insecticide	X	X
Ethalfuralin	Herbicide	X	
Ethephon	Plant growth regulator	X	X
Ethofumesate	Herbicide	X	X
Ethoxysulfuron	Herbicide	X	X
Ethprophos	Insecticide	X	X
Etofenprox	Insecticide	X	X
Etoxazole	Insecticide	X	X

SUBSTANCE	ACTION	Commission criteria	Parliament criteria
Etridiazole	Fungicide	X	
Famoxadone	Fungicide	X	X
Fenamidone	Fungicide	X	X
Fenamiphos	Insecticide	X	X
Fenazaquin	Insecticide	X	
Fenbuconazole	Fungicide	X	
Fenbutatin oxide	Insecticide	X	
Fenhexamid	Fungicide	X	X
Fenoxaprop p	Herbicide	X	X
Fenoxycarb	Insecticide	X	

SUBSTANCE	ACTION	Commission criteria	Parliament criteria
Fenpropidin	Fungicide	X	X
Fenpropimorph	Fungicide	X	X
Fenpyroximate	Insecticide	X	X
Ferric phosphate	Molluscicide	X	X
Fipronil	Insecticide	X	X
Flazasulfuron	Herbicide	X	X
Florasulam	Herbicide	X	X
Fluazifop – p	Herbicide	X	
Fluazinam	Fungicide	X	X
Fludioxonil	Fungicide	X	X
Flufenacet	Herbicide	X	X
Flufenoxuron	Insecticide	X	X
Flumioxazine	Herbicide	X	X
Fluometuron	Herbicide	X	X
Flupyrasulfuron methyl	Herbicide	X	X
Fluquinconazole	Fungicide	X	
Flurochlofidone	Herbicide	X	
Fluroxypyr	Herbicide	X	X
Flurprimidol			X
Flurtamone	Herbicide	X	X
Flusilazole	Fungicide	X	X
Flutolanil	Fungicide	X	X
Folpet	Fungicide	X	X
Foramsulfuron	Herbicide	X	X
Forchlorfenuron	Plant growth regulator	X	
Formetanate	Insecticide	X	X
Fosetyl	Fungicide	X	X
Fosthiazate	Insecticide	X	X

Fuberidazole	Fungicide	X	X
Gliocaldium catenulatum	Fungicide	X	X
Glufosinate	Herbicide	X	X
Glyphosate	Herbicide	X	X
Guatazine	Fungicide	X	
Hexythiazox	Insecticide	X	
Hymexazol	Fungicide	X	
Imazalil	Fungicide	X	X
Imazamox	Herbicide	X	X
Imazaquin	Plant growth regulator	X	X
Imazosulfuron	Herbicide	X	X
Imidacloprid	Insecticide	X	X
Indoxacarb	Insecticide	X	X
Iodosulfuron	Herbicide	X	X
loxynil	Herbicide	X	X
Iprodione	Fungicide	X	X

SUBSTANCE	ACTION	Commission criteria	Parliament criteria
Iprovalicarb	Fungicide	X	X
Isoproturon	Herbicide	X	X
Isoxaben	Herbicide	X	
Isoxaflutole	Herbicide	X	X
Kresoxim methyl	Fungicide	X	X
Lambda cyhalothrin	Insecticide	X	X
Laminarin	?	X	X
Lecanicillimu muscarium	Insecticide		X
Lenacil	Herbicide	X	X
Linuron	Herbicide	X	X
Lufenuron	Insecticide	X	X
Magnesium phosphide	Insecticide	X	X
Maleic hydrazide	Plant growth regulator	X	X
Mancozeb	Fungicide	X	X
Maneb	Fungicide	X	X
MCPA	Herbicide	X	X
MCPB	Herbicide	X	X
Mecoprop	Herbicide	X	X
Mecoprop - p	Herbicide	X	X
Mepanipyrim	Fungicide	X	X
Mepiquat	Herbicide	X	X
Mesosulfuron	Herbicide	X	X
Mesotrione	Herbicide	X	X
Metalaxyl - M	Fungicide	X	X
Metaldehyde	Molluscicide	X	

SUBSTANCE	ACTION	Commission criteria	Parliament criteria
Metam	Soil Sterilant	X	X
Metamitron	Herbicide	X	X
Metarhizium anisopliae	Insecticide		X
Metazachlor	Herbicide	X	X
Metconazole	Fungicide	X	X
Methamidophos	Insecticide	X	
Methiocarb	Insecticide	X	X
Methoxyfenozide	Insecticide	X	X
Metiram	Fungicide	X	X
Metosulam	Herbicide	X	
Metrafenone	Fungicide	X	X
Metribuzin	Herbicide	X	X
Metsulfuron methyl	Herbicide	X	X
Milbemectin	Insecticide	X	X
Molinate	Herbicide	X	X
Myclobutanil	Fungicide	X	
Napropamide	Herbicide	X	
Nicosulfuron	Herbicide	X	X
Oryzalin	Herbicide	X	

SUBSTANCE	ACTION	Commission criteria	Parliament criteria
Oxadiargyl	Herbicide	X	X
Oxadiazon	Herbicide	X	X
Oxamyl	Insecticide	X	X
Oxasulfuron	Herbicide	X	X
Oxyfluorfen	Herbicide	X	
Paclobutrazol	Herbicide	X	
Paecilomyces fumosoroseus	Fungicide	X	X
Paecilomyces lilacinus	Fungicide		X
Penconazole	Fungicide	X	X
Pencycuron	Fungicide	X	
Pendimethalin	Herbicide	X	X
Pethoxamid	Herbicide	X	X
Phenmedipham	Herbicide	X	X
Phlebiopsis gigantea	Fungicide		X
Phosmet	Insecticide	X	X
Picloram	Herbicide	X	X
Picolinafen	Herbicide	X	X
Picoxystrobin	Fungicide	X	X
Pirimicarb	Insecticide	X	X
Pirimiphos methyl	Insecticide	X	X

SUBSTANCE	ACTION	Commission criteria	Parliament criteria
Prochloraz	Fungicide	X	
Prohexadione calcium	Plant growth regulator	X	X
Propamocarb	Fungicide	X	X
Propaquizafop	Herbicide	X	X
Propargite	Insecticide	X	
Propiconazole	Fungicide	X	X
Propineb	Fungicide	X	X
Propoxycarbazono	Herbicide	X	X
Propyzamide	Herbicide	X	X
Prosulfocarb	Herbicide	X	X
Prosulfuron	Herbicide	X	
Prothioconazole	Fungicide		X
Pseudomonas chlororaphis	Fungicide	X	X
Pymetrozine	Insecticide	X	X
Pyraclostrobin	Fungicide	X	X
Pyraflufen ethyl	Herbicide	X	X
Pyridaben	Insecticide	X	
Pyridate	Herbicide	X	X
Pyrimethanil	Fungicide	X	X
Pyriproxyfen	Insecticide	X	X
Quinmerac	Herbicide	X	
Quinoclamine	Herbicide	X	X
Quinoxyfen	Fungicide	X	X

SUBSTANCE	ACTION	Commission criteria	Parliament criteria
Quizalofop - p - ethyl	Herbicide	X	X
Quizalofop - p - tefuryl	Herbicide	X	X
Rimsulfuron	Herbicide	X	X
Silthiofam	Fungicide	X	X
Sintofen	Hybridising agent	X	
S - metolachlor	Herbicide	X	X
Sodium 5 nitroguaiacolate	Plant growth regulator	X	X
Sodium o nitrophenolate	Plant growth regulator	X	X
Sodium p nitrophenolate	Plant growth regulator	X	X
Spinosad	Insecticide	X	X
Spiroxamine	Fungicide	X	X
Spodotera exigua	Insecticide	X	X
Streptomyces griseoviridis	Fungicide		X
Sulcotrione	Herbicide	X	
Sulfosulfuron	Herbicide	X	

Tau fluvalinate	Insecticide	X	
Tebuconazole	Fungicide	X	X
Tebufenozide	Insecticide	X	
Tebufenpyrad	Insecticide	X	X
Teflubenzuron	Insecticide	X	X
Tefluthrin	Insecticide	X	X
Tepraloxydim	Herbicide	X	X
Terbuthylazine	Herbicide	X	
Tetraconazole	Fungicide	X	X
Thiabendazole	Fungicide	X	X
Thiacloprid	Insecticide	X	X
Thifensulfuron methyl	Herbicide	X	X
Thimethoxam	Insecticide	X	X
Thiobencarb	Herbicide	X	
Thiophanate methyl	Fungicide	X	X
Thiram	Fungicide	X	X
Tolclofos methyl	Fungicide	X	X
Tralkoxydim	Herbicide	X	X
Triadimenol	Fungicide	X	X
Triallate	Herbicide	X	X
Trichoderma atroviride	Herbicide		X
Trichoderma gamsii	Herbicide		X
Trichoderma harzianum			X
Trichoderma polysporum	Herbicide		X

SUBSTANCE	ACTION	Commission criteria	Parliament criteria
Trisulfuron	Herbicide	X	X
Triazoxide	Fungicide	X	
Tribenuron	Herbicide	X	X
Triclopyr	Herbicide	X	X
Trifloxystrobin	Fungicide	X	X
Triflumuron	Insecticide	X	X
Triflusulfuron	Herbicide	X	X
Trinexapac	Plant growth regulator	X	X
Triticonazole	Fungicide	X	
Tritosulfuron	Herbicide		X
Verticillium dahliae	Herbicide		X
Warfarin	Rodenticide	X	X
Zeta cypermethrin	Insecticide	X	X
Ziram	Fungicide	X	X
Zoxamide	Fungicide	X	X

Appendix II: Summary table of substances suggested as likely to be excluded by EU expert assessments

Substances that may not be approved	Federal Ministry of Food, Agriculture And Consumer Protection, Germany	KEMI Sweden	Pesticide Safety Directorate, UK Table 2a findings	Pesticide Safety Directorate, UK Table 2b findings	Pesticide Safety Directorate, UK Table 2c findings	Pesticide Safety Directorate, UK Annex 3 findings
Number of substances examined		271	278	278	278	278
HERBICIDES			2,4-D (ED ?)			2,4-D
						2,4-DB
	Aclonifen (PBT)					
		Amitrol (ED)	Amitrol (ED ?)	Amitrol (ED ?)	Amitrol (R3)	
						Dichlorprop -p
	Glufosinate (CMR)	Glufosinate (CMR)	Glufosinate (R2)	Glufosinate (R2)	Glufosinate (R2)	
	Flumioxazin (CMR)		Flumioxazine (R2)	Flumioxazine (R2)	Flumioxazine (R2)	
	loxynil (ED)	loxynil (ED)	loxynil (ED ?)	loxynil (ED ?)	loxynil (R3)	
		Linuron (CMR/ED)	Linuron (R2 + ED ?)	Linuron (R2 + ED ?)	Linuron (R2 + ED ?)	
						MCPA
						MCPB
						Mecoprop
						Mecoprop - p
			Metribuzin (ED ?)	Metribuzin (ED ?)		
		Molinate (ED)				
	Pendimethalin (PBT)	Pendimethalin (PBT)	Pendimethalin (PBT)	Pendimethalin (PBT)	Pendimethalin (PBT)	
			Picloram (ED ?)			
	Quinoxifen (PBT)					
	Tepaloxymid (ED)	Tepaloxymid (ED)				
		Tralkoxydim (ED)				
			Trisulfuron (ED ?)			

Substances that may not be approved	Federal Ministry of Food, Agriculture And Consumer Protection, Germany	KEMI Sweden	Pesticide Safety Directorate, UK Table 2a findings	Pesticide Safety Directorate, UK Table 2b findings	Pesticide Safety Directorate, UK Table 2c findings	Pesticide Safety Directorate, UK Annex 3 findings
Number of substances examined		271	278	278	278	278
FUNGICIDES			Bitertanol (R2 + ED ?)	Bitertanol (R2 + ED ?)	Bitertanol (R2 + ED ?)	
	Carbendazim (CMR)	Carbendazim (CMR)	Carbendazim (M2/R2 + ED ?)	Carbendazim (M2/R2+ ED ?)	Carbendazim (M2/R2 + ED ?)	
			Cyproconazole (ED ?)	Cyproconazole (ED ?)	Cyproconazole (R3C3)	
			Difenoconazole (ED ?)			
		Dinocap (CMR)	Dinocap (R2)	Dinocap (R2)	Dinocap (R2)	
	Epiconazole (ED)	Epoxiconazole (ED)	Epoxiconazole (ED ?)	Epoxiconazole (ED ?)	Epoxiconazole (C3R3)	
			Fenbuconazole (ED ?)	Fenbuconazole (ED ?)	Fenbuconazole (R3)	
			Fluquinconazole (ED ?)			
		Flumioxazin (CMR)				
	Flusilazole (CMR)	Flusilazole (CMR/ED)	Flusilazole (R2 + ED ?)	Flusilazole (R2+ ED ?)	Flusilazole (R2 + ED ?)	
	Iprodione (ED)	Iprodione (ED)	Iprodione (ED ?)			
	Mancozeb (ED)	Mancozeb (ED)	Mancozeb (ED ?)	Mancozeb (ED ?)	Mancozeb (R3)	
	Maneb (ED)	Maneb (ED)	Maneb (ED ?)	Maneb (ED ?)	Maneb (R3)	
	Metconazole (ED)	Metconazole (ED)	Metconazole (ED ?)	Metconazole (ED ?)	Metconazole (R3)	
			Metiram (ED ?)			Metiram
			Myclobutanil (ED ?)	Myclobutanil (ED ?)		
			Penconazole (ED ?)			
			Prochloraz (ED ?)			
			Propiconazole (ED ?)			
		Quinoxyfen (vPvB/POP ?)	Quinoxyfen (vPvB)	Quinoxyfen (vPvB)	Quinoxyfen (vPvB)	

Substances that may not be approved	Federal Ministry of Food, Agriculture And Consumer Protection, Germany	KEMI Sweden	Pesticide Safety Directorate, UK Table 2a findings	Pesticide Safety Directorate, UK Table 2b findings	Pesticide Safety Directorate, UK Table 2c findings	Pesticide Safety Directorate, UK Annex 3 findings
	Tebuconazole (ED)	Tebuconazole (ED)	Tebuconazole (ED ?)	Tebuconazole (ED ?)	Tebuconazole (R3)	
			Tetraconazole (ED ?)			
			Thiram (ED ?)			Thiram
			Triticonazole (ED ?)			
			Triadimenol (ED ?)			
						Ziram

Substances that may not be approved	Federal Ministry of Food, Agriculture And Consumer Protection, Germany	KEMI Sweden	Pesticide Safety Directorate, UK Table 2a findings	Pesticide Safety Directorate, UK Table 2b findings	Pesticide Safety Directorate, UK Table 2c findings	Pesticide Safety Directorate, UK Annex 3 findings
Number of substances examined		271	278	278	278	278
INSECTICIDES						
						Acrinathrin
						Alpha cypermethrin
						Beta cyfluthrin
	Bifenthrin (PBT)	Bifenthrin (PBT/POP ?)	Bifenthrin (PBT/vPvB, ED ?)	Bifenthrin (PBT/vPvB, ED)	Bifenthrin (PBT/vPvB, ED ?)	
						Chlorpyrifos
						Chlorpyrifos methyl
						Cyfluthrin
						Cypermethrin
		Lufenuron (PBT/vPvB)	Lufenuron (PBT/vPvB)	Lufenuron (PBT/vPvB)	Flufenoxuron (C2/PBT)	
			Deltamethrin (ED ?)	Deltamethrin (ED ?)		

Substances that may not be approved	Federal Ministry of Food, Agriculture And Consumer Protection, Germany	KEMI Sweden	Pesticide Safety Directorate, UK Table 2a findings	Pesticide Safety Directorate, UK Table 2b findings	Pesticide Safety Directorate, UK Table 2c findings	Pesticide Safety Directorate, UK Annex 3 findings
			Dimethoate (ED ?)			Dimethoate
	Esfenvalerate (PBT)		Esfenvalerate (PBT)	Esfenvalerate (PBT)	Esfenvalerate (PBT)	
						Ethoprophos
						Etofenprox
						fenamiphos
			Flufenoxuron (C2/PBT)	Flufenoxuron (C2/PBT)	Flufenoxuron (CMR/PBT)	
						Formetanate
						Fosthiazate
						Lambda cyhalothrin
	Metaflumizone (PBT)					
						Methamidophos
						Methiocarb
						Oxamyl
						Phosmet
						Pirimicarb
						Pirimiphos methyl
						Tau fluvalinate
						tefluthrin
		Thiacloprid (ED)				
						Zeta cypermethrin

Substances that may not be approved	Federal Ministry of Food, Agriculture And Consumer Protection, Germany	KEMI Sweden	Pesticide Safety Directorate, UK Table 2a findings	Pesticide Safety Directorate, UK Table 2b findings	Pesticide Safety Directorate, UK Table 2c findings	Pesticide Safety Directorate, UK Annex 3 findings
Number of substances examined		271	278	278	278	278
Others						
PG		Flurprimidol (CMR?/ED)				
Rodenticide	Warfarin (CMR)		Warfarin (R1)	Warfarin (R1)	Warfarin (R1)	
Soil Sterilant						
						Metam

Appendices III – IX: **Notes**

In Appendices III – IX, the following symbols or short notes have been used in the tables:

- (i) “Bio” Denotes a biological control agent.
- (ii) “Temp reg” after the name of the substance denotes a temporary rather than a full registration.
- (iii) “W/E” denotes withdrawn/not included in Annex I of Directive 91/414/EEC.
- (iv) “Pending” denotes awaiting the published findings of the evaluation of the product and whether it will/will not be included in Annex I of Directive 91/414/EEC.
- (v) “No” Denotes use of this product likely not to be withdrawn
- (vi) “Yes” Denotes use of this product likely to be/may be withdrawn
- (vii) “Not evaluated” denotes not assessed by PSD.

Appendix III: French bean production: Kenyan registered pesticides, their current EU status and possible implications of proposed changes to EU plant product registration

Data taken from the PCPB list of Registered Pesticides dated May 2008.

1. Insecticides

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Abamectin	Annex I	No	No	Yes
Acephate	W/E	-----	-----	-----
Acetamiprid	Annex I	No	No	No
Acrinathrin	Annex I	No	No	Yes
Alpha cypermethrin	Annex I	No	No	No
Amblyseius californicus (Bio)	Not reviewed	Not evaluated	Not evaluated	Not Evaluated
Amitraz	W/E	-----	-----	-----
Aphidius transcaaspinus (Bio)		Not evaluated	Not evaluated	Not Evaluated
Azadirachtin	Pending	Not evaluated	Not evaluated	Not Evaluated
Beauveria bassiana (Bio)	Not listed for review	Not evaluated	Not evaluated	Not Evaluated
Beta cyfluthrin	Annex I	No	No	No
Bifenthrin	Annex I	Yes		
Bt var kurstaki (Bio)	Annex I	Not evaluated	Not evaluated	Not Evaluated
Carbaryl	W/E	-----	-----	-----
Carbofuran	Withdrawn	-----	-----	-----
Carbosulfan	Withdrawn	-----	-----	-----
Chlorpyrifos	Annex I	No	No	No
Cyfluthrin	Annex I	No	No	No
Cyhexatin (Temp reg)	W/E	-----	-----	-----
Cypermethrin	Annex I	No	No	No
Zeta cypermethrin	List 3	No	No	No

"No" Denotes use of this product likely not to be withdrawn

"Yes" Denotes use of this product likely to be/may be withdrawn

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Cypermethrin + Profenofos (Temp reg)	Annex I W/E	-----	-----	-----
Cyromazine	Annex I	No	No	No
Deltamethrin	Annex I	No	No	Yes
Diafenthiuron	W/E	-----	-----	-----
Diazinon	W/E	-----	-----	-----
Dicofol	W/E	-----	-----	-----
Diflubenzuron	Annex I	No	No	No
Diglyphus isaea (Bio)	Not listed for review	Not evaluated	Not evaluated	Not evaluated
Dimethoate	Annex I	No	Yes	Yes
Encarsia Formosa (Bio)	Not listed for review	Not evaluated	Not evaluated	Not evaluated
Endosulfan	W/E	-----	-----	-----
Ethion	W/E	-----	-----	-----
Ethoprophos	Annex I	No	No	Yes
Fenitrothion	W/E	-----	-----	-----
Fenthion	W/E	-----	-----	-----
Fipronil	Annex I	No	No	Yes
Gamma cyhalothrin (Temp reg)	W/E	-----	-----	-----
Imidacloprid	Annex I	No	No	Yes
Imidacloprid + Pencyuron	Annex I Annex I	No	No	Yes
Lambda cyhalothrin	Annex I	No	No	Yes
Malathion	W/E	-----	-----	-----
Metham sodium	Annex I	No	Yes	Yes
Methiocarb	Annex I	No	No	No
Methomyl	W/E	-----	-----	-----
Mineral oil (Temp reg)	W/E	-----	-----	-----
Omethoate	W/E	-----	-----	-----
Oxamyl	Annex I	No	No	Yes
Oxydemeton methyl	W/E	-----	-----	-----
Parathion methyl	W/E	-----	-----	-----
PCNB	W/E	-----	-----	-----
Phytoseilus persimilis (Bio)	Not reviewed	Not evaluated	Not evaluated	Not evaluated
Pirimicarb	Annex I	No	No	Yes
Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Pirimiphos methyl	Annex I	No	No	Yes

Pymetrozine (Temp reg)	Annex I	No	No	No
Pyrethrins	Pending	Not evaluated	Not evaluated	Not evaluated
Sodium fluosilicate (Temp reg)	W/E	-----	-----	-----
Spinosad	Annex I	No	No	Yes
Sulphur	Pending	Not evaluated	Not evaluated	Not evaluated
Teflubenzuron (Temp reg)	Annex I	No	No	No
Tetradifon	W/W	-----	-----	-----
Thiamethoxam	Annex I	No	No	No
Thiamethoxam + Metalaxyl – M + Difenconazole	Annex I Annex I Annex I	No	Yes	No
Thiocyclam	W/E	-----	-----	-----
Trichlorfon	W/E	-----	-----	-----

2. Fungicides

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Azoxystrobin	Annex I	No	No	No
Bitertanol	Annex I	Yes		
Bupirimate	Annex I	No	No	No
Captan	Annex I	No	No	No
Carbendazim	Annex I	Yes		
Chlorothalonil	Annex I	No	No	No
Copper oxychloride	Pending	No	No	No
Cuprous oxide	Pending	No	No	No
Cupric hydroxide	Pending	No	No	No
Famoxidine + Cymoxanil	Annex I Annex I	No	No	No
Hexaconazole	W/E	-----	-----	-----
Imidacloprid + Pencyuron	Annex I Annex I	No	No	Yes
Mancozeb	Annex I	Yes		
Mancozeb + Cymoxanil	Annex I Annex I	Yes		
MetalaxylM + Mancozeb	Annex I Annex I	Yes		
Neem oil	Pending	Not evaluated	Not evaluated	Not evaluated
Propineb	Annex I	No	No	No
Propineb + Cymoxinil	Annex I Annex I	No	No	No

Sulphur	Awaited	Not evaluated	Not evaluated	Not evaluated
Tebuconazole	Annex I	No	No	No
Tetraconazole	Annex I	No	Yes	Yes
Thiamethoxam	Annex I	No	No	No

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Thiamethoxam + Metalaxyl - M + Difenconazole	Annex I Annex I Annex I	No	Yes	{ ? }
Thiophonate methyl	Annex I	No	No	No
Triadimefon	W/E	-----	-----	-----
Trichoderma asper- ullum (Bio)	Not reviewed	Not evaluated	Not evaluated	Not evaluated
Trichoderma har- zianum (Bio)	Not reviewed	Not evaluated	Not evaluated	Not evaluated
Triforine	W/E	-----	-----	-----

3. Herbicides

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Glufosinate ammo- nium	Annex I	Yes		
Glyphosate	Annex I	No	No	No
Haloxypop - R	W/E	-----	-----	-----
Linuron	Annex I	Yes		
Paraquat dichloride	W/E	-----	-----	-----
Pendimethalin	Annex I	Yes	N	N
Quizalofop -P -te- furyl	Annex I	No	No	No

Appendix IV: Pea production: Kenyan registered pesticides, their current EU status and possible implications from proposed changes in EU plant product registration

Data taken from the PCPB list of registered pesticides dated May 2008.

1. Insecticides

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Abamectin	Annex I	No	No	Yes
Alpha cypermethrin	Annex I	No	No	No
Amblyseius californicus (Bio)	Not listed for review	Not evaluated	Not evaluated	Not evaluated
Amitraz	W/E	-----	-----	-----
Aphidius transcaspinus (Bio)	Not listed for review	Not evaluated	Not evaluated	Not evaluated
Azadirachtin	Pending	Not evaluated	Not evaluated	Not evaluated
Beauveria bassiana (Bio)	Not listed for review	Not evaluated	Not evaluated	Not evaluated
Beta cyfluthrin	Annex I	No	No	No
Bifenthrin	Annex I	Yes		
Bt var kurstaki (Bio)	Annex I	Not evaluated	Not evaluated	Not evaluated
Carbaryl	W/E	-----	-----	-----
Carbofuran	W/E	-----	-----	-----
Chlorpyrifos	Annex I	No	No	No
Cyhexatin (Temp reg)	W/E	-----	-----	-----
Cypermethrin	Annex I	No	No	No
Cypermethrin + Profenofos (Temp reg)	Annex I W/E	-----	-----	-----
Cyromazine	Annex I	No	No	No
Deltamethrin	Annex I	No	Yes	Yes
Diazinon	W/E	-----	-----	-----
Dicofol	W/E	-----	-----	-----
Diflubenzuron	Annex I	No	No	No

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Diglyphus isaea (Bio)	Not listed for review	Not evaluated	Not evaluated	Not evaluated
Dimethoate	Annex I	N	N	(N)
Encarsia Formosa (Bio)	Not listed for review	Not evaluated	Not evaluated	Not evaluated
Endosulfan	W/E	-----	-----	-----
Ethion	W/E	-----	-----	-----
Ethoprophos	Annex I	No	No	Yes
Fenitrothion	W/E	-----	-----	-----
Fenthion	W/E	-----	-----	-----
Fipronil	Annex I	No	No	Yes
Gamma cyhalothrin (Temp reg)	W/E	-----	-----	-----
Indoxacarb	Annex I	No	No	No
Lambda cyhalothrin	Annex I	No	No	Yes
Malathion	W/E	-----	-----	-----
Metham sodium	Annex I	No	Yes	Yes
Methomyl	W/E	-----	-----	-----
Omethoate	W/E	-----	-----	-----
Oxydemeton methyl	W/E	-----	-----	-----
Parathion methyl (Tem reg)	W/E	-----	-----	-----
Pirimiphos methyl	Annex I	No	No	Yes
Pymetrozine (Temp reg)	Annex I	No	No	No
Pyrethrins	Pending	Not evaluated	Not evaluated	Not evaluated
Sodium fluosilicate (Temp reg)	W/E	-----	-----	-----
Teflubenzuron (Temp reg)	Annex I	No	No	No
Thiamethoxam	Annex I	No	No	No
Thiocyclam	W/E	-----	-----	-----
Trichlorfon	W/E	-----	-----	-----

2. Fungicides

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Azoxystrobin	Annex I	No	No	No
Bupirimate	Annex I	No	No	No
Carbendazim	Annex I	Yes		
Chlorothalonil	Annex I	No	No	Yes
Copper oxychloride	Pending	No	No	No
Cuprous oxide	Pending	No	No	No
Flutriafol	W/E	-----	-----	-----
Fosetyl - al	Annex I	No	No	No
Mancozeb	Annex I	Yes		
Mancozeb + Cymoxanil	Annex I Annex I	Yes		
MetalaxylM + Mancozeb	Annex I Annex I	Yes		
Propineb	Annex I	No	No	No
Propineb + Cymoxinil	Annex I Annex I	No	No	No
Sulphur	Awaited	Not evaluated	Not evaluated	Not evaluated
Thiamethoxam + Metalaxyl – M + Difenconazole	Annex I Annex I Annex I	No	Yes	
Thiophonate methyl	Annex I	No	No	No

3. Herbicides

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Glufosinate ammonium	Annex I	Yes		
Glyphosate	Annex I	No	No	No
Haloxypop - R	W/E	-----	-----	-----
Linuron	Annex I	Yes		
Paraquat dichloride	W/E	-----	-----	-----
Pendimethalin	Annex I	Yes		
Quizalofop –P - tefuryl	Annex I	No	No	No

Appendix V: Passion fruit production: Kenyan registered pesticides, their current EU status and possible implications from proposed changes in EU plant product registration

In the following tables, the substances listed are taken from the May 2008 PCPB Registered Products list as registered for use on passion fruit (2 substances only), tree crops, fruits, fruit trees or for horticultural use and updated from Table 3 of the January 2009 PIP Crop Protocol for Passion Fruit.

1. Insecticides

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Azadirachtin	Pending	Not evaluated	Not evaluated	Not Evaluated
Buprofezine	Annex I	No	No	No
Chlorpyrifos	Annex I	No	No	No
Deltamethrin	Annex I	No	Yes	Yes
Dimethoate	Annex I	No	Yes	Yes
Lambda cyhalothrin	Annex I	No	No	Yes
Malathion	W/E	-----	-----	-----
Methomyl	W/E	-----	-----	-----
Pyrethrins	Pending	Not evaluated	Not evaluated	Not evaluated
Tetradifon	W/E	-----	-----	-----
Thiocyclam	W/E	-----	-----	-----

2. Fungicides

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Mancozeb	Annex I	Yes		
Propineb	Annex I	No	No	No

3. Herbicides

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Glufosinate ammonium	Annex I	Yes		

Glyphosate is also registered, although the registered use is difficult to interpret; the above compound is specifically listed as for passion fruit.

Appendix VI: Yam production and storage: treatment recommendations from the PIP technical itinerary May 2008 and possible implications from proposed changes in EU plant product registration

1. Insecticides

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Azadirachtin	Pending	Not evaluated	Not evaluated	Not evaluated
Bacillus Thuringiensis	Annex I	Not evaluated	Not evaluated	Not evaluated
Carbaryl	W/E	-----	-----	-----
Cypermethrin	Annex I	No	No	No
Deltamethrin	Annex I	No	Yes	Yes
Diazinon	W/E	-----	-----	-----
Dimethoate	Annex I	No	Yes	Yes
Esfenvalerate	Annex I	Yes		
Malathion	W/E	-----	-----	-----
Pirimiphos methyl	Annex I	No	No	Yes

2. Fungicides

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Azoxystrobin	Annex I	No	No	No
Benomyl	W/E	-----	-----	-----
Copper salts	Pending	No	No	No
Dicloran	W/E	-----	-----	-----
Fludioxonil	Annex I	No	No	No
Imazalil	Annex I	No	No	No
Mancozeb	Annex I	Yes		
Thiabendazole	Annex I	No	No	No
Thiophanate methyl	Annex I	No	No	No

Appendix VII: Yam cultivation and storage: products registered in Jamaica, current EU status and possible implications from proposed changes in EU plant product registration

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Fusarium oxysporium control, Penicillium mould, stem-end rot	Fludioxonil	No	No	No
Rhizopus rot (post harvest)	Dicloran	W/E	-----	-----
Rhizopus spp.	Imazalil	No	No	No

The above data was taken from the current Pesticides Control Authority, Jamaica website database.

APPENDIX VIII: Papaya cultivation: products registered in Jamaica, current EU status and possible implications from proposed changes in EU plant product registration

1. Insecticides

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Abamectin	Annex I	No	No	Yes
Acetamiprid	Annex I	No	No	No
Fenpropathrin	W/E	-----	-----	-----
Imidacloprid	Annex I	No	No	Yes
Azadirachtin	Pending	Not evaluated	Not evaluated	Not evaluated
Malathion	W/E	-----	-----	-----

2. Fungicides

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Copper sulphate	Pending	No	No	No
Copper hydroxide	Pending	No	No	No
Mancozeb	Annex I	Yes		

3. Herbicides

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Diuron	W/E	-----	-----	-----
Glyphosate	Annex I	No	No	No
Paraquat	W/E	-----	-----	-----

APPENDIX IX: Pineapple cultivation, MD2 variety: treatment recommendations from the PIP crop protocol (March 2009), current EU status and possible implications from proposed changes in EU plant product registration

1. Pre-planting

Substance	Registered	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Bromacil	Côte d'Ivoire, Ghana	W/E	-----	-----	-----
Ametryn	Côte d'Ivoire	W/E	-----	-----	-----
Glyphosate		Annex I	No	No	No
Paraquat		W/E	-----	-----	-----

2. Plant Crop Pre-Forcing Controls

Substance	Registered	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Bromacil	Côte d'Ivoire, Ghana	W/E	-----	-----	-----
Ametryn	Côte d'Ivoire	W/E	-----	-----	-----
Ethoprophos	Côte d'Ivoire	Annex I	No	No	Yes
Hydramethylnon		W/E	-----	-----	-----
Diazinon	Côte d'Ivoire, Ghana	W/E	-----	-----	-----
Fosetyl - al	Côte d'Ivoire	Annex I	No	No	No
Metalaxyl - M	Côte d'Ivoire	Annex I			
	No	No	No		
Metalaxyl-M + Mancozeb	Ghana	Annex I W/E	Yes		

3. Plant Crop After Forcing Control

Substance	Registered	91/414 Review decision	Original assessment : Commission criteria	Original assessment Parliament criteria	Revised Assessment
Flocumafen		W/E	-----	-----	-----
Carbaryl		W/E	-----	-----	-----
Diazinon	Côte d'Ivoire, Ghana	W/E	-----	-----	-----

4. Ratoon Crop before Forcing

Substance	Registered	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Ethoprophos	Côte d'Ivoire,	Annex I	No	No	Yes
Diazinon	Côte d'Ivoire, Ghana	W/E	-----	-----	-----
Hydramethylnon		W/E	-----	-----	-----

5. Ratoon Crop After Forcing

Substance	Registered	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Flocumafen		W/E	-----	-----	-----
Carbaryl		W/E	-----	-----	-----
Diazinon	Côte d'Ivoire, Ghana	W/E	-----	-----	-----

6. Ratoon Crop Before Degreening

Substance	Registered	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Diazinon	Côte d'Ivoire, Ghana	W/E	-----	-----	-----

7. Pest and Disease Control on Seed Bed After Chopping

Substance	Registered	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Hydramethylnon		W/E	-----	-----	-----
Ethoprophos	Côte d'Ivoire	Annex I	No	No	Yes
Diazinon	Côte d'Ivoire, Ghana	W/E	-----	-----	-----
Fosetyl - al	Côte d'Ivoire	Annex I	No	No	No

8. Spot Treatments

Substance	Registered	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Bromacil	Côte d'Ivoire, Ghana	W/E	-----	-----	-----
Ethoprophos	Côte d'Ivoire	Annex I	No	No	Yes
Diazinon	Côte d'Ivoire, Ghana	W/E	-----	-----	-----

9. Post Forcing Plant Crop

Substance	Registered	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Flocumafen		W/E	-----	-----	-----
Carbaryl		W/E	-----	-----	-----
Diazinon	Côte d'Ivoire, Ghana	W/E	-----	-----	-----

10. After Forcing Ratoon Crop

Substance	Registered	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Flocumafen		W/E	-----	-----	-----
Carbaryl		W/E	-----	-----	-----
Diazinon	Côte d'Ivoire, Ghana	W/E	-----	-----	-----

11. Forcing

Substance	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Calcium Carbide	Pending	Not evaluated	Not evaluated	Not evaluated
Etherel	Pending	Not evaluated	Not evaluated	Not evaluated
Ethylene	Pending	Not evaluated	Not evaluated	Not evaluated

APPENDIX X: Pineapple cultivation (II), Smooth Cayenne variety: treatment recommendations from the PIP crop protocol (March 2009), current EU status and possible implications from proposed changes in EU plant product registration

1. Insecticides

Substance	Registered	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Buprofezine		W/E	-----	-----	-----
Cadusaphos	Côte d'Ivoire	W/E	-----	-----	-----
Carbosulfan	Côte d'Ivoire	W/E	-----	-----	-----
Chlorpyrifos	Côte d'Ivoire, Kenya	Annex I	No	No	Yes
Deltamethrin	Ghana				
Tanzania	Annex I	No	Yes	Yes	
Diazinon	Côte d'Ivoire				
Tanzania, Kenya	W/E	-----	-----	-----	-----
Dimethoate	Côte d'Ivoire				
Tanzania	Annex I	No	Yes	Yes	
Ethoprophos	Côte d'Ivoire	Annex I	No	No	Yes
Fenamiphos		Annex I	No	No	Yes
Fosthiazate			No	No	Yes
Imidacloprid	Côte d'Ivoire	Annex I	No	No	Yes
Lambda cyhalothrin	Ghana				
Tanzania	Annex I	No	No	Yes	
Oxamyl	Kenya	Annex I	No	No	Yes
Thiamethoxam		Annex I	No	No	No

2. Fungicides

Substance	Registered	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Fosetyl - Al	Côte d'Ivoire Kenya Tanzania	Annex I	No	No	No
Imazalil	Côte d'Ivoire	Annex I	No	No	No
Maneb	Côte d'Ivoire	Annex I	Yes		
Mancozeb	Ghana, Tanzania	Annex I	Yes		
Mefenoxam		W/E	-----	-----	-----
Metalaxyl - M		Annex I	No	No	No
Triadimenol		Annex I	No	Yes	No
Triadimefon, Kenya	Côte d'Ivoire	W/E	-----	-----	-----

3. Herbicides

Substance	Registered	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Bromacil	Côte d'Ivoire Tanzania, Kenya	W/E	-----	-----	-----
Diuron	Côte d'Ivoire Tanzania, Kenya	W/E	-----	-----	-----
Glyphosate	Côte d'Ivoire Kenya Tanzania	Annex I	No	No	No
Paraquat	Tanzania	W/E	-----	-----	-----

Appendix XI: Okra cultivation: treatment recommendations from the PIP crop protocol (October 2008), current EU status and possible implications from proposed changes in EU plant product registration

1. Insecticides

Substance	Registered	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Abamectin	Kenya, Tanzania	Annex I	No	No	Yes
Azadirachtin	Kenya, Tanzania	Pending	Not evaluated	Not evaluated	Not evaluated
Bacillus Thuringiensis	Kenya, Tanzania	Annex I	Not evaluated	Not evaluated	Not evaluated
Beta cyfluthrin	Kenya, Tanzania	Annex I	No	No	No
Bifenthrin	Kenya, Tanzania	Annex I	Yes		
Cadusaphos	Kenya, Tanzania				
Carbofuran	Côte d'Ivoire, Ghana, Kenya, Tanzania				
	W/E	-----	-----	-----	
Carbosulfan	Kenya	W/E	-----	-----	-----
Chlorpyrifos	Ghana, Kenya, Tanzania	Annex I	No	No	No
Cypermethrin	Côte d'Ivoire, Jamaica, Kenya, Tanzania	Annex I	No	No	No
Deltamethrin	Côte d'Ivoire, Ghana, Jamaica, Kenya, Tanzania	Annex I	No	Yes	Yes
Diazinon	Ghana, Jamaica, Kenya, Tanzania	W/E	-----	-----	-----
Dimethoate	Côte d'Ivoire, Kenya, Tanzania	Annex I	No	Yes	Yes
Imidacloprid	Kenya, Tanzania	Annex I	No	No	Yes
Lambda cyhalothrin	CILLS, Côte d'Ivoire, Ghana, Jamaica, Kenya, Tanzania	Annex I	No	Yes	
Malathion	Côte d'Ivoire, Jamaica, Kenya, Tanzania	W/E	-----	-----	-----
Spinosad	Jamaica, Kenya, Tanzania	Annex I	No	No	yes
Thiamethoxam	Kenya	Annex I	No	No	No

2. Fungicides

Substance	Registered	91/414 Review decision	« most likely » to be withdrawn	« may be » withdrawn	Candidate for substitution
Azoxystrobin	Kenya, Tanzania	Annex I	No	No	No
Carbendazim	Côte d'Ivoire, Kenya, Tanzania	Annex I	Yes		
Chlorothalonil	Côte d'Ivoire, Kenya, Tanzania	Annex I	No	No	Yes
Difenoconazole	Kenya, Tanzania	Annex I	No	Yes	No
Iprodione	Côte d'Ivoire, Kenya, Tanzania	Annex I	Yes		
Mancozeb	Côte d'Ivoire, Ghana, Jamaica, Kenya, Tanzania	Annex I	Yes		
Maneb	Côte d'Ivoire, Ghana	Annex I	Yes		
Metalaxyl – M	Côte d'Ivoire, Kenya, Tanzania	Annex I	No	No	No
Copper compounds	Côte d'Ivoire, Kenya, Tanzania	List 3	No	No	No
Sulphur	Kenya, Tanzania	Awaited	Not evaluated	Not evaluated	Not evaluated
Thiophonate methyl	Côte d'Ivoire, Kenya, Tanzania	Annex I	No	No	No
Thiram	Kenya, Tanzania	Annex I	No	Yes	No



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Rue du Trône, 98
B-1050 Brussels Belgium
www.coleacp.org/pip

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